

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re: Colleen Beth Higgins)	Case No.: 16-30731-KLP
)	
Debtor.)	Chapter 13
_____)	

EVIDENCE OF DAMAGES RE: 9011 MOTION FOR SANCTIONS BY DEBTOR

Attached is evidence of time accrued by Debtor's counsel in defending the Motions and Objections believed to be frivolous by Debtor and her counsel.

Colleen Beth Higgins

/s/ Brett Alexander Zwerdling
Counsel

Certificate of Service

I hereby certify that on April 20, 2021 a true copy of the foregoing was emailed, or electronically served, upon the following:

Office of the U.S. Trustee
701 E. Broad St, Room 4304
Richmond, VA 23219

Laurie Pearce at lp23294us@yahoo.com

Suzanne E. Wade, 13 Trustee
P.O. Box 1780
Richmond, VA 23218

/s/ Brett Alexander Zwerdling

Brett Alexander Zwerdling, Esquire
Zwerdling, Oppleman & Adams
5020 Monument Avenue
Richmond VA 23230

Invoice submitted to:
Colleen Higgins
9601 Iredell Road
Richmond VA 23235

April 20, 2021
In Reference To: Additional Attorneys Fees for Motion to
Dismiss and Objection to 1328 Hearing
Invoice #10018

Professional services

		<u>Hrs/Rate</u>	<u>Amount</u>
2/26/21	BAZ Review Review Motion to Dismiss / Objection to 1328 filed by Laurie Pearce	0.10 350.00/hr	35.00
3/3/21	BAZ Draft Drafted Reply and Response and request for sanctions - reviewed with client for accuracy	1.00 350.00/hr	350.00
3/4/21	BAZ File Documents final draft of responses completed and filed with the court - served and emailed upon Laurie Pearce	0.70 350.00/hr	245.00
3/8/21	BAZ Phone client Discussed evidence of her being current with support order	0.20 350.00/hr	70.00

Colleen Higgins

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
4/16/21	BAZ Appointment discussed hearing strategy, evidence and testimony to be offered	0.30 350.00/hr	105.00
	BAZ E-mail registered for court hearing	0.10 350.00/hr	35.00
4/19/21	BAZ Review Review of documents provided by client to be used as evidence at the hearings - telephone with client re what happened at JDR hearing on 3/31/21	0.50 350.00/hr	175.00
	BAZ File Documents Prepared and Filed Exhibits to be presented at hearings	0.50 350.00/hr	175.00
	BAZ E-mail Voluntarily shared exhibits and other non-exhibit papers with UST per their request - emailed copy of exhibits to Laurie Pearce	0.50 350.00/hr	175.00
4/21/21	BAZ Hearing Anticipated time of hearing on 4/21/21	1.00 350.00/hr	350.00
	For professional services rendered	<u>4.90</u>	<u>\$1,715.00</u>
	Balance due		<u><u>\$1,715.00</u></u>

Colleen Higgins

Page 3

Timekeeper summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brett Alexander Zwerdling	4.90	350.00	\$1,715.00